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May 16, 2022

***FILED ELECTRONICALLY.***

Clerk  
United States Bankruptcy Court  
50 Walnut Street  
Newark, NJ 07102

Re: **DEBTOR: SOSA, JULIO**  
**CASE #: 19-23132-RG**

Dear Sir:

Please be advised that this firm represents JULIO SOSA, Debtor with regard to captioned matter.

I am in receipt of the Creditor's Certification of Default filed seeking relief from the stay filed on behalf of Lakeview Loan Servicing, LLC, the loan servicer for M&T Bank.

The creditor seeks relief from the stay with regard to the Debtor's one (1) family home located at 327 Sheridan Avenue, Roselle Park, New Jersey.

Please be advised that the debtor has been approved for a Partial Claim Second Mortgage in the amount of \$38,030.86.

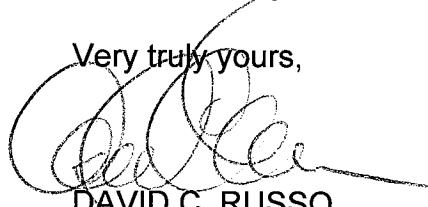
We have filed an application with the Court for approval to have the Debtor execute the Partial Claim Second Note and Mortgage so that the Debtor's mortgage account will be brought current.

That Motion is pending before the Court and is scheduled for hearing on June 1, 2022.

Therefore, the Debtor respectfully requests that the mortgagee's application for relief from the stay be denied subject to the Bankruptcy Court approving the execution of the Partial Claim Second Note and Mortgage by the Debtor in favor of the mortgagee, M&T Bank.

If there are any questions, please feel free to contact me at my Teaneck office.

Very truly yours,



DAVID C. RUSSO

DCR:db

cc: Mr. & Mrs. Julio Sosa